Filed: 04/23/2015

UNITED STATES COURT OF APPEALS DISTRICT OF COLUMBIA CIRCUIT

VERIZON NEW ENGLAND INC.,))
Petitioner,)
v.))
NATIONAL LABOR RELATIONS BOARD,) Case Number: 15-1062)
Respondent.)))

PETITIONER'S STATEMENT OF ISSUES TO BE RAISED

Pursuant to the Clerk's Order dated March 24, 2015, Petitioner Verizon New England Inc. ("Verizon") submits the following statement of the issues to be presented to the Court:

- 1. Did the National Labor Relations Board ("NLRB") err by usurping the authority of the Arbitrator to interpret and apply the parties' collective bargaining agreement?
- 2. Did the NLRB err by usurping the role of the federal courts to review arbitration awards which do not comply with applicable standards under federal policy?
- 3. Did the NLRB err by departing from its own established standards in reversing the Administrative Law Judge's decision to defer to the prior arbitration

award under *Speilberg Mfg. Co.*, 112 NLRB 1080 (1955) and *Olin Corp.*, 268 NLRB 573 (1984)?

- 4. Did the NLRB err by finding that the prior arbitration award is not susceptible of an interpretation that is consistent with the NLRA, concluding that the arbitration decision is clearly repugnant to the Act, and therefore holding deferral to the arbitration award was not appropriate?
- 5. Did the NLRB err in ordering Verizon to post the notice attached to the NLRB's decision at 362 NLRB No. 24 at "Appendix"?

Respectfully Submitted,

VERIZON NEW ENGLAND INC.,

Filed: 04/23/2015

By its Attorneys,

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Dated: April 23, 2015 atelegen@seyfarth.com

CERTIFICATE OF SERVICE

I, Arthur G. Telegen, Esq., hereby certify that on April 23, 2015, copies of

the foregoing PETITIONER'S STATEMENT OF ISSUES TO BE RAISED

was served upon the following via pre-paid first class U.S. Mail:

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